



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

RQ-2

Robert K. Wilson, Treasurer
Ohio Republican State Central
and Executive Committee
AKA: The Ohio Republican Party
172 East State Street, Ste. 400
Columbus, OH 43215

SEP 19 1995

Identification Number: C00162339

Reference: Amended October Quarterly Report (7/1/94-9/30/94)
dated 3/9/95

Dear Mr. Wilson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The totals on Schedule H4, Page 3, Item A, and Page 8, Item B appear to be incorrect. FEC calculations indicate these amounts to be \$8,612 and \$7,947.80, respectively.

-The allocation percentage used for the entries indicated above also appears to be in error. Schedule H1 indicates that the federal allocation for administrative and generic voter drive costs is 22%.

-In reference to your letter of June 20, 1994 (see attached) it appears that your committee is incorrectly allocating administrative costs. Please be advised that a committee may establish a separate allocation account into which funds from its federal and non-federal accounts may be deposited solely for the purpose of paying the allocable expenses of joint federal and non-federal activities. This allocation account is considered a federal account, subject to federal reporting requirements.

Further, the committee may transfer funds from its federal and non-federal accounts to its allocation account in amounts proportionate to the federal or non-federal share of each allocable expense. A committee that makes transfers from its non-federal account to its allocation account must itemize in its

reports the allocable activities for which the transfers were intended to pay, and the money must not be transferred more than 10 days before or more than 60 days after the payments for which they were designated.

Any portion of a transfer from a committee's non-federal account to its allocation account that does not meet the above requirements shall be presumed to be a loan or contribution from the non-federal account to a federal account, in violation of the Act. 11 CFR 106.5(g)(1)(ii) and 106.6 (e)(1)(ii)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



J. P. Andre
Reports Analyst
Reports Analysis Division



**Ohio
Republican
Party**

Robert T. Bennett
Chairman

Martha C. Moore
Vice Chairman

June 21, 1994

Federal Election Commission
Attn: Terry Reynolds - Reports Analyst
Reports Analyst Division
999 E. Street, NW
Washington, DC 20463

ID# - 000162339

RE: - April Quarterly Report (1/1/94 - 3/31/94)

Dear Ms. Reynolds:

In response to your letter dated June 15, 1994, please be advised that The Ohio Republican Party utilizes an impressed payroll bank account into which funds are transferred from both the Federal Operating account and the State account to cover the expense of payroll, matching employer taxes and processing fees. The transfer of funds from the Federal Operating account covers payroll expenses for the headquarters political staff, finance staff and telemarketing staff. The transfer from the State account covers payroll expenses for our campaign center staff and other auxiliary staff members.

Since the impressed payroll bank account is classified as a Federal account the transactions are listed on Disbursement Schedule H-4. However since state funds are used to pay Campaign Center payroll costs through the impressed bank account an impermissible transfer of funds did not occur.

Please contact us if there are any additional questions.

Sincerely,


Robert K. Wilson, Treasurer

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